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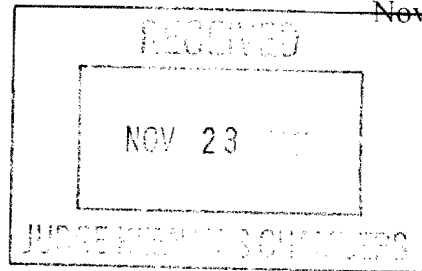
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Honorable John F. Keenan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 1930  
New York, New York 10007



November 22, 2011

Plumbers, Pipefitters & MES Local Union No. 392 Pension Fund v. Fairfax Financial Holdings Limited, et al., No. 11 CV 5097 (JFK)

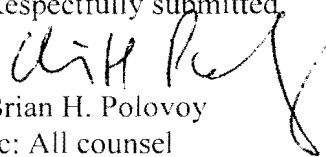
Dear Judge Keenan:

We represent defendants Fairfax Financial Holdings Limited, Odyssey Re Holdings Corp., and the individual defendants. Pursuant to Your Honor's Individual Practice Rule 2D, we write to request permission to file an oversized memorandum of law in support of our clients' motion to dismiss.

The complaint in this securities class action is 617 paragraphs and 210 pages long. It alleges that defendants materially misled Fairfax's investors from May 2003 to March 2006 by, among other things, fraudulently accounting for finite risk reinsurance contracts. It alleges six counts of violations of the U.S. securities laws. In the motion to dismiss, we intend to assert, among other things, that the complaint is barred by applicable limitations periods, that plaintiff lacks standing, and that plaintiff has not adequately alleged a material misrepresentation, loss causation, or scienter. In order to appropriately brief these issues (especially given the length of the complaint and the long procedural history of this case, which was already dismissed by Judge Daniels), we respectfully request permission to file a memorandum of law in support of the motion to dismiss that will not exceed 48 pages.

Plaintiff has advised us that they do not take a position regarding the requested relief. We appreciate the Court's consideration. Please feel free to have your chambers contact me should you have any questions.

Respectfully submitted,

  
Brian H. Polovoy  
cc: All counsel

SO ORDERED this 29 day of November, 2011

  
Hon. John F. Keenan, U.S.D.J.

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